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Please reply to New Jersey

January 26, 2018

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RE: **CIOFFI, MICHAEL VS. BOROUGH OF ENGLEWOOD CLIFFS, ET AL.**

Our File No. : 85341 ELH
Docket No. : 2:16-CV-04536-WJM-MF

Dear Counsel:

As you are aware, we represent Defendant Carrol McMorro in this matter. We recently received a link providing approximately 125 audios in this matter. Please identify each audio indicating the date of the audio, who made the recording, a brief description, the individuals speaking and the relevance of the audio to this matter.

Pursuant to paragraph 8 (a) of the Discovery Confidentiality Order entered in this matter, we object to the designation of these audios as "Attorneys' Eyes Only." While we have not had an opportunity to review the audios at length, what we have reviewed thus far does not appear to warrant any such designation. Moreover, we would need to review these audios with our client in order to properly defend her interests.

If we do not hear from you to the contrary within 14 days, the "Attorneys' Eyes Only" designation will be deemed void in accordance with the Discovery Confidentiality Order.

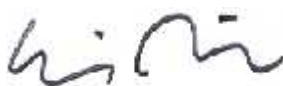
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Finally, in furtherance of our January 18, 2018 letter, please have your client execute the Certification for the document production provided in that letter and provide copies of Bates stamped pages 267 through 286, as those pages were missing from Plaintiff's document production.

If you would like to discuss any of these issues further, please do not hesitate to contact me.

Very truly yours,

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